

**Hearing Date and Time: February 2, 2007 at 10:00 a.m.**  
**Objection Deadline: February 1, 2007 at 5:00 p.m.**

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*Co-Counsel for Tower Automotive, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
	: Chapter 11
DELPHI CORPORATION, <i>et al.</i> ,	:
	:
	: Case No. 05-44481 RDD
Debtors.	:
	:
	: (Jointly Administered)
-----X	

**NOTICE OF MOTION OF TOWER AUTOMOTIVE, INC. FOR RELIEF FROM THE  
AUTOMATIC STAY PURSUANT TO SECTION 362(d) OF THE BANKRUPTCY CODE**

**PLEASE THAT NOTICE** that on January 22, 2007, Tower Automotive, Inc. and certain of its subsidiaries and affiliates (collectively "Tower") filed the annexed Motion dated January 22, 2007 (the "Motion") for an order granting Tower relief from the automatic stay, pursuant to section 362(d) of title 11 of the United States Code (the "Bankruptcy Code"), to permit Tower to file a complaint against Delphi Automotive Systems LLC ("DAS") in the Tower chapter 11 cases currently pending in the Southern District of New York (jointly administered chapter 11 cases no. 05-10578 (ALJ)) commencing an adversary proceeding to avoid and recover transfers made by Tower to DAS, pursuant to sections 547 and 550 of the Bankruptcy Code.

The Motion is scheduled for consideration by the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court, One Bowling Green, New York, New York 10004 on February 2, 2007 at 10:00 a.m.

**PLEASE TAKE FURTHER NOTICE** that objections to the Motion, if any, must be filed electronically and served on the undersigned (with a copy delivered to Judge Drain's Chambers) so as to be received no later than 5:00 p.m. on February 1, 2007.

Dated: January 22, 2007  
Grand Rapids, Michigan

VARNUM, RIDDERING, SCHMIDT  
& HOWLETT LLP

By: /s/ Michael S. McElwee  
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and

Dated: January 22, 2007  
New York, New York

DICONZA LAW, P.C.

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